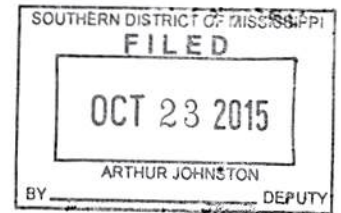


IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION



AUDRAY JOHNSON

PLAINTIFF

CIV. ACTION #: 3:15-cv-761 HTW-LRA

VS.

HINDS BEHAVIORAL HEALTH SERVICES ;

DEFENDANTS

DR. FAYAZ ABDRAABO, MD

COMPLAINT

(JURY TRIAL DEMANDED)

COMES NOW, Plaintiff, Audray Johnson, pro se and for cause of action against the Defendants and for them to be sued in their official and personal capacities-Namely, Hinds Behavioral Health Services and Dr. Fayaz Abdrabbo,

Plaintiff would state:

PARTIES

The Plaintiff, Audray Johnson is an adult resident citizen of Hinds County in the State of Mississippi.

Hinds Behavioral Health is a business, operating in Hinds County in the State of Mississippi.

Dr. Fayaz Abdrabbo, MD is a businessman, practicing psychiatry in the State of Mississippi.

JURISDICTION AND VENUE

This Court has jurisdiction over this matter since the Plaintiff's civil rights, as protected by 42 US civil code §1983 - namely that deals with the Public Service Act of 1944 and et al was violated by Hinds Behavioral Health and Dr. Fayaz Abdrabbo.

See: GARRETT V. DAILEY

FACTS

On about June, 1996 Plaintiff, Audray Johnson began visiting Hinds Behavioral Health for the purpose of monitoring his psychotic drugs. He was taking 1350 mg of Lithium, which was a known kidney irritant. Audray Johnson was vaguely aware of the Kidney risk factor. So he employed the services of Hinds Behavioral Health Services in order to carefully monitor of the obstruction, if any, that it was placing upon the kidneys. The Doctors ordered the test annually and was paid to analyze the results and make the appropriate recommendations to the patient. Audray Johnson wasn't trained to analyze the results so he relied 100% on the Doctor to advise him whether or not to discontinue the Lithium.

One odd thing that Audray Johnson noticed the first few visits he made with the institution was a small sign placed on the appointment card holder. It read "Chairman of the Bored". Yes, that was how they spelled board- 'bored'. He was shocked, but he suppressed the thought and didn't mention it to anyone. The company's mission, through its own admission was to bore its clients, not to uplift them and give them good quality mental healthcare.

After consuming the lithium for a little less than 20 years, apparently, it began to have an effect on Audray's kidney function. As early as January, 2009, Dr. Abdrabbo was notified by Audray's primary care physician that he was in Stage

II kidney failure. Dr. Abdrabbo ignored the warning and continued to prescribe the now poison to his kidneys.

Audray Johnson was never warned about the results from Dr. Abdrabbo. So finally in December of 2012, he went into Stage III kidney failure. He lost almost 50% of his kidney function. He became delusional and delirious and wandered from his home for four hours on a trek that normally takes 25 minutes. Dr. Abdrabbo also got the plaintiff hooked on controlled substances and then abruptly halted the writing of the prescriptions to Audray, causing sleepless nights, chest pains, and elevated blood pressure.

This was intentionally done because Audray didn't fit the stereotypical profile of the rest of the center's clients. He has a career. He is a part-time school teacher and minister.

Hinds Behavioral Health, through Dr. Fayaz Abdrabbo, used their control over the Plaintiff in order to cause him bodily harm.

Finally, after punishing Audray for all those years, he removed Audray from the 1350 mg to eventually 300mg- something he could have easily done sooner. He then abruptly stopped being Audray's physician, leaving him to fend for himself.

This was attempted assassination of a person of Color in the State of Mississippi.

QUESTION CONCERNING STATUTE OF LIMITATION

The statute of limitation does not begin running until the actual discovery of the professional negligence and violation of civil rights. Thus, on around January 14, 2014 is the start date- the date of discovery.

CLAIM FOR RELIEF

The Defendants, individually and jointly owed to the Plaintiff an ordinary duty of care, specifically the duty to provide professional care for any mental health care services performed by the Defendants. The Defendants breached said duty and were negligent, failing to provide the Plaintiff with good quality mental care. They committed an intentional violation of the Plaintiff's Civil Rights by prohibiting him from having access to quality healthcare as provided by the Public Service Act of 1944. This was also a violation of a Doctor's Hippocratic oath which is to preserve life and protect the best interests of his or her patient.

DAMAGES

Plaintiff seeks damages for pain and suffering and for the permanent damage caused to his kidneys and other organs. Defendants' acts and omissions constituted gross negligence. Plaintiff seeks compensatory and punitive damages in an amount to deter the Defendants from similar or like conduct.

The Plaintiff, Audray Johnson, requests a trial by jury. In addition, he requests all expenses and costs of this civil action to be paid by the Defendants.

10-23-15

Dated _____ 2015

Respectively submitted,

A handwritten signature in black ink, appearing to be 'Audray Johnson', written over a horizontal line.

Audray Johnson, pro se